

Scott M. Riemer (SR 5005)  
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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
KAREN BARRETT,

10 CV 4600 (AKH)

Plaintiff,

NOTICE OF MOTION

-against-

HARTFORD LIFE AND ACCIDENT  
INSURANCE COMPANY,

Defendant

-----X

PLEASE TAKE NOTICE that, upon the annexed Local Rule 56.1 Statement;  
affirmation of Scott M. Riemer, dated March 29, 2011, together with exhibits thereto, and upon  
all prior proceedings herein, plaintiff will move this Court before the Honorable Alvin K.  
Hellerstein, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, on a  
date and time to be designated by the Court, or as soon thereafter as counsel can be heard, for an  
order granting summary judgment in favor of plaintiff pursuant to Fed. R. Civ. P. Rule 56, and  
for such other relief as the Court deems just and proper.

Dated: New York, New York  
March 29, 2011

RIEMER & ASSOCIATES LLC  
Attorneys for Plaintiff  
60 East 42<sup>nd</sup> Street, Suite 1750  
New York, New York 10165  
(212) 297-0700

By: /s/Scott M. Riemer  
Scott M. Riemer (SR5005)

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on March 29, 2011 I served a true and complete copy of the foregoing Memorandum of Law by transmitting the same by electronic mail to the following individuals at the e-mail addresses indicated:

Michael H. Bernstein, Esq.  
Sedgwick Detert Moran & Arnold LLP  
125 Broad Street, 39<sup>th</sup> Floor  
New York, New York 10004-2400  
Tel.: (212) 422-0202  
Fax: (212) 422-0925  
*Attorneys for Defendants*

I also certify that this document filed through the ECF system will be sent electronically to all registered participants on March 29, 2011.

Dated: New York, New York  
March 29, 2011

/s/Scott M. Riemer  
Scott M. Riemer (SR5005)